

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MORTON GROVE)	
PHARMACEUTICALS, INC.)	
)	
Plaintiff,)	
)	No: 08-CV-1384
v.)	
)	Judge Bucklo
THE NATIONAL PEDICULOSIS)	Magistrate Judge Mason
ASSOCIATION, INC.,)	
)	
Defendant.)	
)	

**MORTON GROVE PHARMACEUTICALS, INC.'S
MOTION FOR PROTECTIVE ORDER AND TO QUASH SUBPOENA**

Morton Grove Pharmaceuticals, Inc. ("Morton Grove"), by its attorneys, hereby moves pursuant to Federal Rules of Civil Procedure 26(c) and 45(c)(3) for this Court to exercise its discretion in managing discovery issues and enter a protective order to stop Defendant, the National Pediculosis Association, Inc. ("NPA"), from continuing to harass Morton Grove and its lobbying website vendor, Closerlook, Inc., with irrelevant first- and third-party discovery concerning Morton Grove's lobbying activities.

1. The grounds for this motion are fully set forth in the accompanying memorandum of law and incorporated by reference herein.

WHEREFORE, Morton Grove respectfully requests that the Court issue a protective order mandating that no further lobbying discovery be had and quashing the third-party subpoena issued to Closerlook, Inc.

Dated: May 22, 2008

Respectfully Submitted,

MORTON GROVE PHARMACEUTICALS, INC.

By: /s/ W. Gordon Dobie
One of its Attorneys

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CERTIFICATION

I, William C. O'Neil, attorney of record for Plaintiff Morton Grove Pharmaceuticals, Inc., hereby offer the following Rule 26(c) and Local Rule 37.2 certification with respect to Morton Grove Pharmaceutical, Inc.'s Motion for Protective Order and to Quash Subpoena. As to this motion, I certify that after extensive correspondence over many months with NPA's attorneys, detailed in the accompanying memorandum, both via teleconference and written correspondence, the parties were not able to reach accord on the matters that are the subject of the motion and did not reach an accord thereafter. Most recently, the parties confirmed that they were at an impasse with regard to the lobbying documents during a telephonic conference on May 21, 2008, whose participants included Wade Thomson and myself. I further certify that I have made good faith attempts at reaching an accord on all matters in the foregoing motion.

Dated: May 22, 2008

/s/William C. O'Neil

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May 2008, I caused a copy of **Morton Grove Pharmaceuticals, Inc.'s Motion for Protective Order and to Quash Subpoena** to be served on counsel of record via ECF electronic filing:

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